

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

SAILAJA M. PAIDIPATY (NYBN 5160007)  
CHRIS KALTSAS (NYBN 5490602)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
FAX: (415) 436-7234  
sailaja.paidipaty@usdoj.gov  
chris.kaltsas2@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	<b>CASE NO. 23-0118 BLF</b>
Plaintiff,	)	
v.	)	<b>STIPULATION AND [PROPOSED] ORDER TO</b>
	)	<b>CONTINUE SENTENCING HEARING FROM</b>
RICHARD SZE,	)	<b>JUNE 11, 2024, TO JULY 30, 2024</b>
Defendant.	)	

Defendant Richard Sze, by and through his counsel, and the United States, by and through undersigned counsel, hereby stipulate and agree as follows:

The above-captioned matter is currently scheduled for sentencing on June 11, 2024. To allow additional time for the government to finalize its sentencing recommendation including any possible cooperation departure and to accommodate defense counsel's trial schedule, the parties jointly agree and request that the sentencing hearing be continued until July 30, 2024, at 9:00 a.m. The parties have consulted with the Court's deputy to confirm the Court's availability and have also consulted with the

//

//

1 assigned U.S. Probation Officer who is available on the newly requested date.

2 IT IS SO STIPULATED.

3  
4 DATED: May 29, 2024

Respectfully submitted,

5 ISMAIL J. RAMSEY  
6 United States Attorney

7 /s/  
8 SAILAJA M. PAIDIPATY  
9 CHRIS KALTSAS  
Assistant United States Attorneys

10 DATED: May 29, 2024

11 /s/  
FRANK UBHAUS  
12 BERLINER COHEN LLP  
13 Counsel for Richard Sze

14 **[PROPOSED] ORDER**

15 With agreement of the parties and for the reasons stated above, the sentencing hearing currently  
16 set for June 11, 2024, is hereby continued until July 30, 2024 at 9 a.m.

17 IT IS SO ORDERED.

18  
19 DATED:

20 HON. BETH LABSON FREEMAN  
21 United States District Judge  
22  
23  
24  
25  
26  
27  
28